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November 14, 2023

**Via ECF**

Honorable Edgardo Ramos  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, New York 10007

**Re: Federal Trade Commission v. IOVIA Holdings Inc., 23 Civ. 6188 (ER)  
(S.D.N.Y.)**

Dear Judge Ramos:

We are counsel for non-party Healio Strategic Solutions LLC (“Healio”), a witness in the above captioned matter. Healio submits this letter motion seeking *in camera* treatment of a single confidential document Bates stamped “Healio-FTC000022,” pursuant to Paragraph 11 of the Amended Protective Order in this matter. Counsel for the FTC and counsel for IQVIA consent to this request.

We request that the document numbered Healio-FTC000022, attached here under seal as Exhibit A, remain confidential and under seal, and that it only be reviewed *in camera* if admitted into evidence. This document is a non-public, internal record of Healio. It details Healio’s confidential revenue figures, including its programmatic business revenue and its total business revenue generated for the years 2021 and 2022. Healio would suffer irreparable harm if its competitors or the public were given access to this highly private financial information. Because this internal document shows Healio’s generated revenue, the information contained in this document is sufficiently material to Healio’s business that disclosure would result in serious

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competitive injury. Accordingly, we respectfully request that the Court order that the document be admitted only *in camera* if offered into evidence at the upcoming hearing.

On November 9, 2023, we received notifications from counsel for the FTC and counsel for IQVIA, pursuant to the Amended Protective Order, that both parties in the current litigation may introduce documents designated by Healio as confidential as public exhibits at an upcoming hearing. We have conferred with counsel for both the FTC and IQVIA about these notifications. Counsel for both parties consent to our request that the document Bates stamped Healio-FTC000022 remain sealed and confidential if offered into evidence at the upcoming hearing.

Accordingly, Healio respectfully requests that the Court “So Order” this request that the document Bates stamped Healio-FTC000022 remain confidential and under seal, and that it only be reviewed *in camera* if admitted into evidence.

Respectfully submitted,

s/Steven D. Feldman

Steven D. Feldman  
Partner

Exhibit A (filed under seal)

cc: All Counsel (via ECF)